

SEP 17 1991

Patty Roberts
Ecology and Environment, Inc.
Cloverleaf Building 3
6405 Metcalf
Overland Park, Kansas 66202

RE: TDD #FO7-9003-005
PAN #FK50285RA

Dear Ms. Roberts:

As discussed over the phone on September 3, 1991 with Mark Matthews, here are our current comments on the above referenced document. We will be forwarding information received by Olin as soon as it arrives.

- ✓ 1. Page 2-5, first paragraph, third sentence: "The majority of identified waste stored in the permitted container storage area exhibit characteristics of reactivity, corrosivity, ignitability, and/or EP toxicity as denoted in 40 Code of Federal Regulations (CFR) Subpart C (E & E 1990)." Characteristics of hazardous waste are denoted in 40 CFR, Part 261, Subpart C.
- ✓ 2. Page 4-2, section 4.3, last sentence: Permeability would be more appropriately qualified as low rather than slow.
- ✓ 3. Page 5-1, section 5.1: During the VSI, were there any cracks or gaps observed in the concrete floor of the hazardous waste container storage area? The report should discuss the condition of the floor and sump of the unit.
- ✓ 4. Page 5-5, section 5.2: About how often is the waste that accumulates in the sump vat and trench pumped out? Approximately what quantity of waste is being pumped out?
- ✓ 5. Page 5-7, last full sentence on the page: "The VSR sump vat and collection trench is monitored from the inside of the VSR Blending Room (Dame 1990)." How is the sump vat and collection trench being monitored?

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- ✓ 6. Page 5-8, section 5.3.1, second paragraph, fourth sentence:
"An on/off valve located in the center of the C/F drainage system regulates whether the SWMU unit is continuous with the plant's sewer discharge system (Appendix A; Photo 17; Figure 5-1)."
"SWMU unit" is redundant.
- ✓ 7. In this report, several of the SWMU's are described as being "not RCRA-regulated". This statement can have several different interpretations and thus be somewhat confusing. The only distinction between SWMUs which is of importance in this report is whether a SWMU requires RCRA permitting or not. Please revise the text accordingly.
8. Page 5-9, section 5.3.1, "Release Controls" paragraph: Have any of the wastes contained in the C/F Blending Room trench been drummed because they did not meet the POTW discharge parameters outlined in Olin's wastewater discharge permit?
- ✓ 9. Page 5-12, "Wastes Managed" paragraph, first sentence: See comment #6.
- ✓ 10. Page 5-10, section 5.4.1, fourth sentence: "Soduim" should be "Sodium".
- ✓ 11. Section 5.4 - It is not clear whether the SWMU identified in this section is the "outlet" (tie-in?) to the large sewer system serving the area, or whether the SWMU being identified is those portions of the plant sewer system which are always opened continuously to the municipal sewer system. The latter approach makes the most sense and the text should clearly reflect this idea.
- ? 12. Have all the plant's drum rinse areas been covered in the report?
- ✓ 13. Section 5.7 - Please describe what the flammable material once contained in the south tank was.

Please submit three (3) copies of the final document.
If you have any questions, please contact Mark Matthews at
(913) 551-7635.

Sincerely yours,

Lyndell L. Harrington, P.E.
Chief, Permits Section
RCRA Branch
Waste Management Division